

# **Building Blocks for Effective Housing Elements**

## **Adequate Sites Inventory and Analysis**

### ***Zoning Appropriate to Accommodate the Development of Housing Affordable to Lower-Income Households***

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*The densities of sites identified in the inventory must be sufficient to encourage and facilitate the development of housing affordable to lower-income households (Section 65583.2(c)(3)(A) &(B).*

#### **I. REQUISITE ANALYSIS**

To identify the sites and establish the number of units that can accommodate the local government's share of the regional housing need for lower-income households, the element must include an analysis that demonstrates the identified zone and densities which encourage and facilitate the development of housing for lower-income households. To provide local governments with greater certainty and clarity in evaluating and determining what densities facilitate the development of housing affordable to lower-income households, the statute provides two options:

- The analysis must, at a minimum, describe the following:
  - (1) market demand and trends;
  - (2) financial feasibility; and
  - (3) information based on residential project experience within a zone(s) where the densities facilitated the development of housing for lower-income households. Information gathered from local developers, and examples of recent residential projects that provide housing for lower-income households is helpful in establishing the appropriateness of the zone. It is recognized that housing affordable to lower income households requires significant subsidies and financial assistance. However, for the purpose of the adequate sites analysis and the appropriateness of zoning, identifying examples of lower density subsidized housing projects alone, is not sufficient or appropriate to demonstrate the adequacy of a zone and/or density to accommodate the housing affordable to lower-income households. In addition, the analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program as this tool is not a substitute for addressing the "adequate sites" requirement. For example, most

communities have found that inclusionary policies work best when the underlying zoning and development standards act to significantly promote housing affordability, including the provision of higher densities and flexible development standards.

- As an alternative to preparing the analysis described above, Government Code Section 65583.2(c)(3)(B) allows local governments to utilize “default” density standards deemed adequate to meet the “appropriate zoning” test. The purpose is to provide a numerical density standard for local governments, resulting in greater certainty in the housing element review process. Specifically, if a local government has adopted density standards that comply with the population based criteria summarized on the next page, no further analysis is required to establish the adequacy of density standard. The default densities for each jurisdiction in the State can be found in HCD’s [AB 2348 Technical Assistance paper](#).

**Default Densities Appropriate to Accommodate Housing for  
Lower-Income Households by Region**

<p style="text-align: center;"><b>I</b></p> <p>Incorporated Cities within nonmetropolitan/rural counties (as outlined in either Section I or II) and Nonmetropolitan counties with micropolitan areas (listed below)</p>	<p style="text-align: center;"><b>II</b></p> <p>Unincorporated areas in all nonmetropolitan counties not included under I</p>	<p style="text-align: center;"><b>III</b></p> <p>Suburban jurisdictions</p>	<p style="text-align: center;"><b>IV</b></p> <p>Metropolitan jurisdictions</p>
<p>Nonmetropolitan counties with micropolitan areas include:</p> <p>Del Norte Humboldt Inyo Lassen Lake Mendocino Nevada Tehama Tuolumne</p>	<p>Nonmetropolitan/rural counties as listed below (list excludes those counties including micropolitan areas as outlined in section I)</p> <p>Alpine Amador Calaveras Colusa Glenn Mariposa Modoc Mono Plumas Sierra Siskiyou Trinity</p>	<p>Jurisdictions (cities/counties) located within a Metropolitan Statistical Area (MSA) with a population of less than 2 million as listed below <u><b>unless</b></u> a <b>city</b> has a population of greater than 100,000 in which case it would be considered metropolitan.</p> <p>Butte                      El Dorado Fresno                    Imperial Kern                        Kings Madera                   Merced Monterey                Napa Placer                    Sacramento San Benito              San Joaquin San Luis Obispo Santa Barbara Santa Clara              Santa Cruz Shasta                    Solano Sonoma                   Stanislaus Sutter                     Tulare Ventura                   Yolo Yuba</p>	<p>Jurisdictions (cities/counties) located within a Metropolitan Statistical Area (MSA) with a population of more than 2 million as listed below <u><b>unless</b></u> a <b>city</b> has a population of less than 25,000 in which case it would be considered suburban.</p> <p>Alameda Contra Costa Los Angeles Marin Orange Riverside San Bernardino San Diego San Francisco San Mateo</p>
<p style="text-align: center;"><b>at least 15 du/ac</b></p>	<p style="text-align: center;"><b>at least 10 du/ac</b></p>	<p style="text-align: center;"><b>at least 20 du/ac</b></p>	<p style="text-align: center;"><b>at least 30 du/ac</b></p>
<p><b>Metropolitan Statistical Area:</b> Qualification of an MSA requires the presence of a city with 50,000 or more inhabitants, or the presence of an Urbanized Area (UA) and a total population of at least 100,000</p>			

## **KEY IDEAS**

### **II. HELPFUL HINTS**

Local governments should reach out to the development community (both for- and non-profit) for feedback and input on the ranges of density needed to promote project feasibility for housing affordable to lower-income households.

In the description of individual projects, the element could describe the amount of per-unit subsidy needed to make the units affordable to lower-income households.

### **III. MODEL ANALYSES**

[Sample Sites Inventory](#)

### **IV. LINKS**

[HCD: AB 2348 \(Mullin\), Statutes of 2004, Chapter 724](#)

[Non-Profit Housing Association of Northern California](#)

[Southern California Association of Non-Profit Housing](#)

[San Diego Housing Federation](#)

[California Building Industry Association](#)